

210 N. Park Ave.

Winter Park, FL

32789

February 6, 2006 Via ECFS

P.O. Drawer 200

Winter Park, FL

32790-0200

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street SW

Tel: 407-740-8575

Fax: 407-740-0613

tmi@tminc.com

RE:

Lightyear Network Solutions, LLC

Docket 06-36

Washington, DC 20554

EB-06-TC-060 - Certification of CPNI Filing - (02/06/06)

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 30, 2006, Lightyear Network Solutions, LLC hereby files a copy of its 2006 Annual Compliance Certification of CPNI as required by section 64.2009(e) of the Commission's rules. As directed by the Public Notice, please include this in Docket 06-36.

Any questions you may have regarding this filing may be directed to me at (407) 740-3004 or via email at rnorton@tminc.com.

Sincerely,

Robin Norton, Consultant to

Lightyear Network Solutions, LLC

cc:

Mr. Byron McCoy, <u>byron.mccoy@fcc.gov</u>

Best Copy and Printing, Inc., fce@bcpiweb.com

ANNUAL OFFICER'S CERTIFICATION OF CUSTOMER PROPIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

I, John J. Greive, certify and state that:

- I am the Vice President of Regulatory Affairs for Lightyear Network Solutions, LLC and have personal knowledge of Lightyear Network Solutions, LLC's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
- 2. I hereby certify that, to the best of my knowledge, information and belief, Lightyear Network Solutions, LLC's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
- 3. A further statement outlining the Lightyear Network Solutions, LLC's operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e)

John J. Greive

Vice President of Regulatory Affairs

Date

Exhibit A Statement of CPNI Procedures and Compliance

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CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006

EB Docket No. 06-36; EB-06-TC-060

Statement of CPNI Procedures and Compliance

Lightyear Network Solutions, LLC ("Lightyear") does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If Lightyear elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Lightyear ensures that its employees do not improperly use or disclose CPNI by requiring that all access to CPNI be approved by the Legal Department which has knowledge of and is familiar with the FCC's CPNI requirements.

Lightyear does not use CPNI in any sales or marketing campaigns whatsoever. The CPNI in Lightyear's possession is not, under any circumstances, provided to outside agents.

All requests for CPNI whether from a customer or by subpoena are handled by Lightyear's Legal Department. Lightyear maintains a record of all instances where CPNI is disclosed or provided to third parties, or where third parties are allowed access to CPNI.

Lightyear has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to CPNI. According to required procedure, a customer must verify the last 4 digits of his/her social security number, amount of last invoice or payment, and the type of service they have with Lightyear.

Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission. The Legal Department maintains a log of all subpoenas, and a folder is kept on each subpoena which includes the subpoena, our response cover letter, and any attachments provided. The subpoena folders are kept for seven (7) years.